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6
 7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 COREY MARCUS VALREY and

13 LAVELL DESHON ROBERTS,

14 Defendants.

15 **SEALED**
 16 **CRIMINAL INDICTMENT**

17 Case No. 2:22-cr-~~220~~-HPG-DJA

18 **VIOLATIONS:**

19 Conspiracy to Commit Wire Fraud
 20 (18 U.S.C. § 1349)

21 Wire Fraud (18 U.S.C. §§ 1343 & 2)

22 Conspiracy to Commit Access Device
 23 Fraud (18 U.S.C. § 1029(b)(2) and
 24 (c)(1)(A)(ii))

Access Device Fraud (18 U.S.C.
 § 1029(a)(5) and (c)(1)(A)(ii))

Aggravated Identity Theft
 (18 U.S.C. § 1028A(a)(1))

19 **THE GRAND JURY CHARGES THAT:**

20 At all times relevant to the indictment:

21 **INTRODUCTION**

22 1. Beginning on a date unknown, but no later than on or about May 11, 2020,

23 and continuing up to and including on or about January 11, 2021, defendants COREY

24 MARCUS VALREY and LAVELL DESHON ROBERTS, and others known and

1 unknown, participated in, devised, and intended to devise a scheme and artifice to defraud
2 for obtaining money and property by means of materially false and fraudulent pretenses,
3 representations, and promises.

4 2. The purpose of the scheme and artifice to defraud was to obtain from the
5 Nevada Department of Employment, Training, and Rehabilitation (“DETR”)
6 unemployment insurance benefits to which defendants were not entitled.

7 3. To carry out the scheme, defendants and others fraudulently applied for and
8 received unemployment insurance benefits from DETR using personal identifying
9 information of other individuals without authorization and without knowledge and
10 approval of the individuals involved. Defendants and others received said unemployment
11 benefits in the form of debit cards, issued by DETR in the names of the individuals whose
12 identities were fraudulently used, where the benefits were disbursed into the accounts
13 associated with said debit cards.

14 4. To ensure receipt of the debit cards, defendants and others had the cards sent
15 to addresses under their control in Texas and California, including commercially available
16 rental mailboxes located in Texas, instead of the actual addresses of the individuals whose
17 identities they stole. Defendants and others then withdrew the fraudulently obtained
18 unemployment benefits by using said debit cards at various ATMs around the country,
19 including ATMs located in Nevada and Texas.

20 5. During the relevant time period, defendants and others received at least 131
21 fraudulently obtained debit cards issued by DETR at four addresses in Texas and California,
22 including two rental mailboxes in Texas, both of which were rented to VALREY. At least
23 10 unemployment insurance debit cards from the states of California and Arizona were also
24 received by defendants. To receive the DETR debit cards, defendants and others caused

1 interstate wire communications from DETR to the bank contracted by DETR to disburse
2 unemployment insurance benefits, directing the bank to produce the debit cards and send
3 them to the aforementioned addresses.

4 6. In total, more than three million dollars in benefits were approved for the 141
5 fraudulently obtained debit cards. At least \$1,946,585 in benefits were disbursed, and at
6 least \$914,384.18 of the unemployment insurance benefits were converted for the use of
7 defendants and others. The last known transaction made using fraudulently obtained debit
8 cards was on January 11, 2021.

9 Overt Acts

10 7. In furtherance of the conspiracy and to effect the objects of the conspiracy, the
11 following overt acts, among others, were committed in the District of Nevada and
12 elsewhere:

13 a. On or about June 20 and 21, 2020, VALREY made numerous ATM
14 withdraws using debit cards issued in the names of J.S., J.T., M.L., C.W., C.Z., and others
15 at various locations in Houston, Texas.

16 b. Beginning on or about June 23, 2020, and continuing up to and
17 including on or about June 27, 2020, VALREY made numerous ATM withdraws using
18 debit cards issued in the names of M.L., R.S., E.S., and others at various locations in Las
19 Vegas, Nevada.

20 c. Beginning on or about June 30, 2020, and continuing up to and
21 including on or about July 6, 2020, ROBERTS made numerous ATM withdraws using
22 debit cards issued in the names of R.B., G.R., A.A., K.R., and others at various locations in
23 Houston, Texas.

24

1 d. On or about July 15, 2020, ROBERTS was found, during a traffic stop
2 in Leon County, Texas, in possession of 10 DETR debit cards, none in his name, and
3 \$50,000 in money orders.

COUNT ONE
Conspiracy to Commit Wire Fraud
(18 U.S.C. § 1349)

8. Paragraphs 1 through 7 are incorporated herein in full.

7 9. Beginning on a date unknown, but no later than on or about May 11, 2020,
8 and continuing up to and including on or about January 11, 2021, in the State and Federal
9 District of Nevada and elsewhere,

COREY MARCUS VALREY and

LAVELL DESHON ROBERTS,

12 defendants herein, and others known and unknown, knowingly combined, conspired,
13 confederated, and agreed to commit an offense against the United States in violation of 18
14 U.S.C. § 1349, that is, to commit wire fraud, in violation of 18 U.S.C. § 1343.

15 10. In furtherance of the conspiracy, defendants performed the overt acts
16 described in Paragraph 7.

11. In furtherance of the conspiracy, defendants caused interstate wire
communications from DETR, located in Nevada, to Bank of America, a bank outside of
Nevada contracted by DETR to disburse unemployment insurance benefits, directing Bank
of America to produce at least 78 DETR debit cards, including the debit cards of J.S., J.T.,
M.L., C.W., C.Z., R.S., E.S., R.B., G.R., and A.A., and send them to one of two mailboxes
that VALREY rented in Texas.

COUNTS TWO TO SEVEN

Wire Fraud

(18 U.S.C. §§ 1343 and 2)

12. Paragraphs 1 through 7 are incorporated herein in full.

13. Beginning on a date unknown, but no later than on or about May 11, 2020,

and continuing up to and including on or about January 11, 2021, in the State and Federal

District of Nevada and elsewhere,

COREY MARCUS VALREY and

LAVELL DESHON ROBERTS,

defendants herein, and others known and unknown, aiding and abetting one another,

10 participated in and devised and intended to devise a scheme and artifice to defraud and for

obtaining money and property by means of materially false and fraudulent pretenses,

12 representations, and promises.

14. On or about the dates below, in the State and Federal District of Nevada and

14 elsewhere, defendants, with others known and unknown, aiding and abetting each other, for

the purposes of executing the scheme and artifice to defraud, transmitted and caused to be

transmitted by means of wire communication in interstate commerce, writings, signs,

signals, pictures, and sounds, that is, an interstate wire communication from DETR

18 in Nevada to Bank of America, outside the state of Nevada, directing Bank of America to

produce the DETR debit cards listed below and send them to one of two mailboxes that

20 VALREX rented in Texas, with each wire communication constituting a separate violation.

of 18 U.S.C. §§ 1343 and 2;

1	COUNT	DATE	DEFENDANT	DETR DEBIT CARD
2	TWO	6/16/2020	VALREY	Issued to victim M.L.
3	THREE	6/16/2020	VALREY	Issued to victim J.S.
4	FOUR	6/18/2020	VALREY	Issued to victim R.S.
5	FIVE	6/22/2020	ROBERTS	Issued to victim G.R.
6	SIX	6/22/2020	ROBERTS	Issued to victim K.R.
7	SEVEN	6/22/2020	ROBERTS	Issued to victim A.A.

5 **COUNT EIGHT**

6 Conspiracy to Commit Access Device Fraud
 7 (18 U.S.C. § 1029(b)(2) and (c)(1)(A)(ii))

8 15. Paragraphs 1 through 7 are incorporated herein in full.

9 16. Beginning on a date unknown, but no later than on or about May 11, 2020,
 10 and continuing up to and including on or about January 11, 2021, in the State and Federal
 11 District of Nevada and elsewhere,

12 **COREY MARCUS VALREY and**

13 **LAVELL DESHON ROBERTS,**

14 defendants herein, with others known and unknown, knowingly combined, conspired,
 15 confederated, and agreed to commit the offense of Access Device Fraud in violation of 18
 16 U.S.C. § 1029(a)(5).

17 17. The object of the conspiracy was to knowingly and with intent to defraud
 18 effect transactions, with one or more access devices issued to another person or persons, to
 19 receive payment or any other thing of value during a one-year period the aggregate value of
 20 which is equal to or greater than \$1,000, that is, more than \$900,000 of unemployment
 21 insurance benefits issued by the states of Nevada, California, and Arizona.

22 18. In furtherance of the conspiracy, defendants performed the overt acts
 23 described in Paragraph 7.

24 19. All in violation of 18 U.S.C. § 1029(b)(2) and (c)(1)(A)(ii).

COUNT NINE
Access Device Fraud
(18 U.S.C. § 1029(a)(5) and (c)(1)(a)(ii))

20. Paragraphs 1 through 7 are incorporated herein in full.

21. Beginning on or about June 20, 2020, and continuing up to and including on or about June 27, 2020, in the State and Federal District of Nevada and elsewhere,

COREY MARCUS VALREY,

defendant herein, knowingly and with intent to defraud, effected transactions with one or more access devices issued to another person to receive things of value, the aggregate value of which was greater than \$1000, during a one-year period, that is, the defendant received at least 10 debit cards containing unemployment insurance benefits issued by DETR in the names of M.L., R.S., E.S., and others and withdrew from ATMs within the District of Nevada approximately \$15,000 of benefits from those cards, said conduct affecting interstate and foreign commerce, in that the debit cards were obtained through transactions conducted over the Internet and issued by Bank of America, which is headquartered outside the State and of Nevada and conducts business in interstate commerce, all in violation of 18 U.S.C. § 1029(a)(5) and (c)(1)(a)(ii).

COUNTS TEN TO FIFTEEN

Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

22. Paragraphs 1 through 21 are incorporated herein in full.

23. On or about the dates below, in the State and Federal District of Nevada.

COREY MARCUS VALREY and

LAVELL DESHON ROBERTS,

defendants herein, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, that is, the name described below, during and in

1 relation to the felony violations described below, knowing that the means of identification
 2 belonged to an actual person, all in violation of 18 U.S.C. § 1028A(a)(1):

COUNT	DATE	DEFENDANT	NAME	PREDICATE FELONIES
TEN	6/20/2020	VALREY	J.S.	18 U.S.C. § 1349 (Count 1) 18 U.S.C. § 1343 (Count 3) 18 U.S.C. § 1029(b)(2) (Count 8) 18 U.S.C. § 1029(a)(5) (Count 9)
ELEVEN	6/23/2020	VALREY	M.L.	18 U.S.C. § 1349 (Count 1) 18 U.S.C. § 1343 (Count 2) 18 U.S.C. § 1029(b)(2) (Count 8) 18 U.S.C. § 1029(a)(5) (Count 9)
TWELVE	6/23/2020	VALREY	R.S.	18 U.S.C. § 1349 (Count 1) 18 U.S.C. § 1343 (Count 4) 18 U.S.C. § 1029(b)(2) (Count 8) 18 U.S.C. § 1029(a)(5) (Count 9)
THIRTEEN	6/30/2020	ROBERTS	K.R.	18 U.S.C. § 1349 (Count 1) 18 U.S.C. § 1343 (Count 6) 18 U.S.C. § 1029(b)(2) (Count 8)
FOURTEEN	7/1/2020	ROBERTS	G.R.	18 U.S.C. § 1349 (Count 1) 18 U.S.C. § 1343 (Count 5) 18 U.S.C. § 1029(b)(2) (Count 8)
FIFTEEN	7/6/2020	ROBERTS	A.A.	18 U.S.C. § 1349 (Count 1) 18 U.S.C. § 1343 (Count 7) 18 U.S.C. § 1029(b)(2) (Count 8)

15 DATED this 18th day of October, 2022.

16 A TRUE BILL:

17
 18 /S/
 19 FOREPERSON OF THE GRAND JURY

20 JASON M. FRIERSON
 21 United States Attorney

22 JIM W. FANG
 23 Assistant United States Attorney